

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

BARBARA DENNIS, on behalf of the  
ESTATE OF JAMES CARTER,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Civil Action No. 3:16-CV-3148-G-BN

**DEFENDANT’S MOTION TO QUASH  
OR ALTERNATIVELY, FOR PROTECTIVE ORDER**

Defendant United States of America moves to quash or, alternatively, for protective order from Plaintiff Barbara Dennis’s Amended Second Notice of Deposition of a Corporate Representative with subpoenas duces tecum, dated August 8, 2017 pursuant to Federal Rule of Civil Procedure 26(c). Defendant’s brief is filed concurrently with this motion pursuant to the local rules. See N.D. Tex. L. Civ. R. 7.1(d).

Dated: September 7, 2017

Respectfully Submitted,

JOHN R. PARKER  
UNITED STATES ATTORNEY

s/ Mary M. (Marti) Cherry  
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**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred multiple times with counsel for Plaintiff regarding Defendant's objections to the deposition of a corporate representative and to re-producing documents at the deposition. (App'x 54-55, 70-77, 95-98). Counsel for Plaintiff advised that he is opposed to the motion. (App'x 99, 113).

**CERTIFICATE OF SERVICE**

I hereby certify that on September 7, 2017, a true copy of the foregoing was submitted via the electronic case filing system with the Clerk of the U.S. District Court, Northern District of Texas and served upon all opposing parties, or their attorneys of record, by electronic delivery on this date.

s/ Mary M. (Marti) Cherry

Mary M. (Marti) Cherry  
Assistant United States Attorney